

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

LIONRA TECHNOLOGIES LIMITED,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 6:22-cv-00351-ADA

JURY TRIAL DEMANDED

**JOINT MOTION FOR ENTRY OF AMENDED AGREED SCHEDULING ORDER AND
UNOPPOSED MOTION FOR LEAVE TO AMEND PLAINTIFF’S INFRINGEMENT
CONTENTIONS**

On October 18, 2022, Plaintiff Lionra Technologies Limited (“Lionra”) served Amended Preliminary Infringement Contentions that added dependent claims 2, 3, 4, 7, 8, 9, 10, 18 of the ’141 Patent. Pursuant to the Court’s Scheduling Order (Dkt. 30 at 1 n.1), Lionra hereby moves for leave to add these patent claims. Defendant Apple Inc. (“Apple”) does not oppose Lionra’s Amended Preliminary Infringement Contentions so long as the Court grants a corresponding extension to the case Scheduling Order. Accordingly, Lionra respectfully requests that the Court grant it leave to amend its infringement contentions, and the parties jointly request that the Court enter the Parties’ agreed Amended Scheduling Order, attached hereto as Exhibit A, in the above-captioned case.

Dated: October 31, 2022

Respectfully submitted,

By: /s/ J. Stephen Ravel

By: /s/ Brett Cooper

J. Stephen Ravel
Texas State Bar No. 16584975
KELLY HART & HALLMAN LLP
303 Colorado St., Suite 2000
Austin, TX 78701-0022
Telephone: (512) 495-6429
Facsimile: (512) 495-6401
Email: steve.ravel@kellyhart.com

Brett E. Cooper (NY SBN 4011011)
bcooper@bc-lawgroup.com
Seth Hasenour (TX SBN 24059910)
shasenour@bc-lawgroup.com
Drew B. Hollander (NY SBN 5378096)
dhollander@bc-lawgroup.com
BC LAW GROUP
200 Madison Avenue, 24th Floor
New York, NY 10016
Phone: (516) 359-9968

Alton L. Absher III (admitted in W.D. Tex.)
KILPATRICK TOWNSEND & STOCKTON LLP
1001 West Fourth Street
Winston-Salem, NC 27101
Telephone: (336) 607-7300
Facsimile: (336) 607-7500
Email: aabsher@kilpatricktownsend.com

Attorneys for Plaintiff Lionra Technologies Limited

Steven D. Moore (admitted in W.D. Tex.)
KILPATRICK TOWNSEND & STOCKTON LLP
Two Embarcadero Center, Suite 1900
San Francisco, CA 94111
Telephone: (415) 576-0200
Facsimile: (415) 576-0300
Email: smoore@kilpatricktownsend.com

Mansi H. Shah (*pro hac vice* filed)
Gail D. Jefferson (*pro hac vice* filed)
KILPATRICK TOWNSEND & STOCKTON LLP
1302 El Camino Real, Suite 175
Menlo Park, CA 94025
Telephone: (650) 326-2400
Facsimile: (650) 326-2422
Email: mansi.shah@kilpatricktownsend.com
Email: gjefferson@kilpatricktownsend.com

Amanda N. Brouillette (*pro hac vice* filed)
KILPATRICK TOWNSEND & STOCKTON LLP
1100 Peachtree Street NE, Suite 2800
Atlanta, GA 30309
Telephone: (404) 815-6500
Facsimile: (404) 815-6555
Email: abrouillette@kilpatricktownsend.com

Patrick Njeim (*pro hac vice* filed)
KILPATRICK TOWNSEND & STOCKTON LLP
1420 Fifth Avenue, Suite 3700
Seattle, WA 98101
Telephone: (206) 467-9600
Facsimile: (206) 623-6793
Email: pnjeim@kilpatricktownsend.com

Attorneys for Defendant Apple Inc.

CERTIFICATE OF SERVICE

I certify that this document is being served upon all counsel of record through the Court's CM/ECF system on October 31, 2022.

/s/ J. Stephen Ravel
J. Stephen Ravel